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Rachel Perillo

December 13, 2019

By ECF

Hon. Loretta A. Preska
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: United States v. Ademola Adebogun,
19 Cr. 291 (LAP)

Dear Judge Preska:

I am the attorney for Ademola Adebogun, the defendant in the above-captioned matter. This letter is respectfully submitted in response to the government's letter, dated December 11, 2019, which opposes Mr. Adebogun's request for a temporary bond modification that would permit him to travel to Lagos, Nigeria from December 30, 2019 to January 14, 2020 for the limited purpose of employment. For the reasons set forth herein, it is respectfully requested that the Court grant Mr. Adebogun's application.

The government claims that Mr. Adebogun's travel request should be denied due to the alleged strength of the evidence in this case against him; that the reasons for his travel do not pose compelling circumstances; and that he has not proffered substantial ties to the United States.

It is submitted Mr. Adebogun has sufficiently substantial ties to the United States to ensure that the bail conditions in place will assure his return to the District. Mr. Adebogun is a dual citizen of Nigeria and the United States who has lived in the United States since 2002. He has worked in the entertainment marketing and promoting business for the last thirteen years,

and while the majority of his work has been located in the United States, he has traveled to Nigeria for the last four years to host the annual event that is the subject of this application. I note this because it is the reason why the government's argument that our client is now traveling to Nigeria to strengthen his ties to that country are ill-conceived because he has been active in this very event for years now; it is not something that he has newly conceived as a pretext to travel to Nigeria to develop an escape plan. Additionally, it must be noted that with this Court's approval, he travelled to Nigeria once before during the pendency of this matter for his father's burial, and returned to the United States as promised.

Finally, Mr. Adebogun's strong family ties to the New York City are central to his motivation to return to the United States. As the Court may recall from a previous bond modification application in June 2019, my client is the father of a four-year-old daughter who resides in Newark, New Jersey with her mother, Keisha Cockfield. Although Mr. Adebogun and Ms. Cockfield are no longer in a romantic relationship, they work together to co-parent their daughter. Mr. Adebogun cares for his daughter during the week after her school day, and spends weekends with her. Additionally, he recently welcomed a second child -- a four-month-old daughter -- who was born to his current girlfriend of three years, Shleby Darkwa. Mr. Adebogun now resides with Ms. Darkwa and their newborn in Brooklyn. Given these significant family ties, it is submitted that Mr. Adebogun has strong reason to return to this District to be with and continue raising caring for his young children who depend on him.

If the Court has any questions regarding this application please contact my office.

Thank you for your attention to this matter.

Respectfully submitted,

/s/

Robert A. Soloway

cc: Daniel Wolf (by Email)
Assistant United States Attorney

Andrew Kessler-Cleary (by Email)
U.S. Pretrial Services Officer